

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re:	)	
	)	
	)	Case No. 18-23538 (RDD)
SEARS HOLDINGS CORPORATION, et al.	)	
	)	Chapter 11
	)	
	)	

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**NOTICE OF MOTION FOR ALLOWANCE AND PAYMENT OF  
ADMINISTRATIVE EXPENSE PURSUANT TO 11 U.S.C. § 503(b) BY  
AMCAP WILSON II, LLC AND WILSON NORRIDGE, LLC**

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TO ALL PARTIES IN INTEREST:

NOTICE IS HERBY GIVEN that AmCap Wilson II, LLC and Wilson Norridge, LLC (collectively “Landlord”) has filed a Motion for Allowance and Payment of Administrative Expense (“Motion”). The Motion is seeking an order allowing Landlord an administrative expense claim of \$394,618.94.

A copy of the Motion is available for inspection in the Bankruptcy Court Clerk’s Office, or upon request from the undersigned attorney.

Pursuant to Rule 2002 of the Federal of Bankruptcy procedure, if you desire to oppose this action you must file a written objection and request a hearing with the Court **on or before January 13, 2020**. You must also serve a copy of your objection on the undersigned attorney. Objections and requests for hearing shall clearly specify the grounds upon which they are based, including the citation of supporting legal authority, if any. General objections will not be considered by the Court.

In the absence of a timely and substantiated objection and request for hearing by an

interested party, the Court may approve or grant the Motion without any further notice to creditors or other interested parties.

Dated: December 23, 2019

Respectfully submitted,

S&D LAW

By: s/ Steven W. Kelly  
Steven W. Kelly, Esq.  
1290 Broadway, Suite 1650  
Denver, Colorado 80203  
(303) 399-3000

ATTORNEYS FOR AMCAP WILSON II, LLC  
and WILSON NORRIDGE, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2019, I caused a copy of the foregoing **NOTICE OF MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE PURSUANT TO 11 U.S.C. § 503(b) BY AMCAP WILSON II, LLC AND WILSON NORRIDGE, LLC** to be served electronically through the Court's CM/ECF notification system upon the following and all other parties on the Master Service List:

Weil, Gotshal & Manges LLP  
Ray C. Schrock, P.C.  
Garrett A. Fail  
Jacqueline Marcus  
Sunny Singh  
767 Fifth Avenue  
New York, NY 10153

Paul Schwartzberg  
Richard Morrissey  
United States Trustee  
U.S. Federal Office Building  
201 Varick Street, Suite 1006  
New York, NY 10014

s/ Vicki Pennington